

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

V.

MOHAMAD HAMADE

)
)
)
)
)
)
)
)
)
)

Criminal No. 04-10214-GAO

JOINT MOTION FOR RELEASE OF DEFENDANT'S PASSPORTS

The parties respectfully move this Court to order United States Pre-Trial Services to release the Defendant's two Lebanese passports to the Defendant. Both are expired. As the basis for this motion, the parties submit that the Defendant requires possession of the expired passports in order to renew his ability to travel and be deported in an expedited manner.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Kimberly P. West
Kimberly P. West
Assistant U.S. Attorney

MOHAMAD HAMADE
Defendant

/s/ John Salsberg
John Salsberg
Counsel for Defendant